



Ryde - Hunter's Hill Flora and Fauna Preservation Society

Member of Nature Conservation Council of N.S.W.

**P.O. Box 552
Gladesville 1675**

Mr Matt Kean, Minister for the Environment & Energy
& Mr Rob Stokes, Minister for Planning & Public Spaces
NSW Department of Planning, Industry & Environment.

Submitted online via the NSW Planning Portal

8 October 2020

Dear Ministers Kean & Stokes,

Objection to the Draft Cumberland Plain Conservation Plan

The Ryde-Hunters Hill Flora & Fauna Preservation Society is a local environment group established over 50 years ago. We actively campaign on the mitigation of climate change, ceasing further exploitation of fossil fuels, supporting renewable energy, protecting native forests and wildlife, opposing destructive land clearing and preserving our precious native biodiversity and natural heritage. The aims and objectives of the Society include:

Respect for the land, its flora and fauna and the original custodians; informing our membership and the community, particularly in the local area, about nature conservation and protection of the environment; the promotion of ecologically sustainable land use and development at the local, state and national levels; and advocating for measures that safeguard the environment from all forms of pollution to ensure, clean air, clean water and a healthy environment and address the climate change crisis.

The Society writes to urge you to reconsider the draft Cumberland Plain Conservation Plan (CPCP) which appears to be designed to facilitate biodiversity certification from the state and federal governments. It has the potential to set aside the standard conservation and offset rules required of developers with an all-in-one 'strategic' approval process and become a template for biodiversity offset schemes across NSW and beyond. This will not prevent a net loss of biodiversity and is opposed.

If the Conservation Plan is approved, around 10,000 hectares of 'urban capable' rural land can be released for development without the need for any further environmental impact assessments. It will accelerate the dismantling of Sydney's remaining green belt and rapidly diminish the Sydney basin's ability to meet 20% of the city's fresh food needs.

The Plan, as drafted, will put the recovering and chlamydia-free South West Sydney koala population on a path to extinction and have a significant impact on eight threatened ecological communities, 25 flora species and 24 fauna species. The Plan will impact over 1,000 hectares of the critically endangered Cumberland Plain Woodland, unique to this region. It is of huge concern that only around 6,400 hectares or 6% of the original 107,000 hectares remains.

We make detailed comments as follows:

- This plan will impact a further 1,014.6 hectares or almost 16% of the critically endangered Cumberland Plain Woodland, leaving less than 5,400 hectares. How is this acceptable?

- The Plan commits to the creation of only one reserve - the Georges River Koala Reserve. There is insufficient clarity about the representation of Cumberland Plain Woodland or other 'grassy woodland communities' in the 4,795 hectares of 'avoided land' to be zoned E2 (environmental conservation).
- Vestiges of the original woodland are not necessarily interconnected with wildlife corridors. The Plan does not accept the Chief Scientist's recommendation to secure all of the east-west habitat corridors for the koalas. It acknowledges that "east-west connectivity between the Georges and Nepean rivers is important for the resilience of the Southern Sydney koala population," but it discounts the recommendation made in a recent report prepared by the Chief Scientist's expert panel, *Advice on the protection of the Campbelltown Koala population (Chief Scientist Koala Report)*, to protect the habitat of the six east-west corridors.
- Instead, the Plan cites unspecified "scientific advice from the department and the research community ... that the existing six east-west corridors in the Greater Macarthur Growth Area are too fragmented and not wide enough to support koalas over the long term." There is no justification or evidence provided for this conclusion. Only the Ousedale Creek to Appin North east-west corridor will be protected. This issue has wider implications for other flora and fauna species, not just for koalas.
- The proposed construction of 120 km of Koala exclusion fencing will isolate and fragment an expanding and thriving population. While the Chief Scientist Koala Report also recommends fencing to keep wildlife away from roads and residential areas, the Plan does not incorporate the Report's recommendation for habitat corridors with a recommended width of 390-450 metres, to be enhanced by 'Asset Protection Zones' and 30 metre wide buffers on either side of the corridor to "reduce the impact of threats, light and noise on koalas."
- Further, the Chief Scientist Koala Report notes that the Ousedale Creek to Appin North corridor, the Plan's preferred east-west corridor, is impeded by "numerous suburban and rural properties between the habitat edge and road surface, on both the east and west sides." The Plan also does not specify an adequate number of koala underpasses or suitable crossings across busy Appin Road.
- If the proposal to build 120 km of koala fencing is implemented without an adequate number of appropriately sized movement corridors, the koalas will be trapped. The Chief Scientist Koala Report confirms the need to maintain connectivity, noting that it helps to "avoid the creation of dead ends where koalas face threats without routes of escape ... once housing development occurs along the western flank of the Mount Gilead site the route for koalas to move east or west will be through a narrow strip of habitat at the confluence of the Nepean River and Menangle Creek ... and conceptual plans illustrate this habitat being potentially surrounded by three roads." This wildlife corridor will become a functional dead-end.
- The Plan lacks a firm commitment to the amount of land to be protected. It does not indicate whether any steps will be taken to protect the integrity of the strategic conservation area before the additional land can be set aside or protected in other ways.
- While the Plan acknowledges that the urban heat island effect in Western Sydney "will increase as urbanisation increases," measures to mitigate its impact are minimal. Western Sydney University research has identified that in Sydney's treeless urban areas morning summer surface temperatures are nearly 13 degrees celsius higher than in vegetated areas. Summer temperatures can rise to over 50 degrees celsius in Western Sydney; a temperature now deemed too hot to be safe for hot water systems!
- The suggested solution of 'Greening our city' - a Premier's Priority program that was announced in 2019 and designed to ensure one million trees are planted by 2022, is inherently flawed. It makes far better sense to preserve existing trees than to remove and replant, particularly as building block sizes are now typically too small to accommodate significant trees.
- The proposed Georges River Koala Reserve falls far short of securing all of the primary, secondary and tertiary koala habitat corridors. The Department of Planning, Industry and Environment (DPIE) 2018 report, *Conserving Koalas in the Wollondilly and Campbelltown Local Government Areas* estimated that 8,293.46 hectares would need to be set aside for this purpose. The state's koala population is now predicted to become functionally extinct in the wild before 2050, according to a report released in June by the Upper House Inquiry into Koala populations and habitat in NSW.

- The Plan does not address the significant adverse impact on the scenic, historic and physical qualities of this unique landscape. The protection of the undeveloped, rural character of the landscape of the Scenic Hills around Campbelltown has been a priority since the earliest planning schemes of the Post-WW2 period. This Plan will completely undo a visionary planning process that attempted to constrain the footprint of the urban areas and encourage only development that would be sympathetic to the scenic and cultural values of one the most picturesque and historic rural landscapes in NSW. In particular, it abandons the “linear city” concept in which natural areas would be readily accessible to the city’s population, and economies are achieved in the provision of service and transport corridors.

Conclusion:

Western Sydney already has a public open space and biodiversity crisis which will be exacerbated by this Plan and further urban sprawl. Population pressures and development are driving poor outcomes for the community as well as our natural and Aboriginal heritage. Numerous dedicated volunteers and environment groups including local Bushcare and Landcare continue to contribute to the restoration of both bushland reserves and private land and the creation of vital wildlife corridors for vulnerable and threatened native species. The CPCP as drafted will be disastrous for regional connectivity and habitat and hasten species extinctions.

We urge you to heed the broader community’s wish to protect Cumberland Plain Woodland and respect local endeavours by rejecting this draft Plan and providing a Conservation Plan that is based on ESD principles and genuinely conserves and protects these precious ecosystems from further exploitation and loss of natural values, now and into the future.

Francis Breen
President

